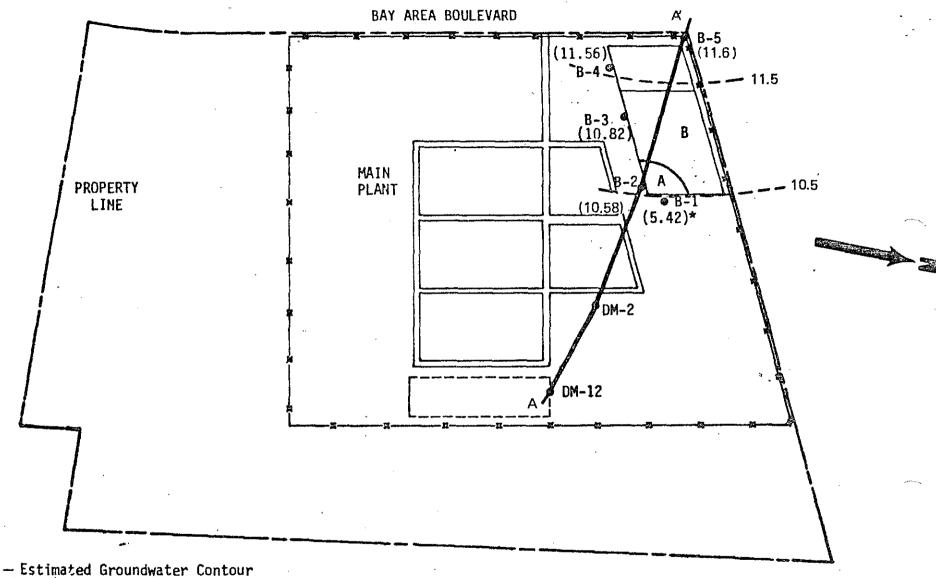
TABLE IĮ

PARAMETER

	H ₂ O ₂ BIO/SAN STREAM	BIO/SAN SURFACE Impoundment Sludge (Extract)	IMPOUNDMENT Impoundment Water
рН	9,9	5.5	8.8
Flash Point	>212 ^O F	>212 ^O F	>212 ^O F
Barium (mg/l)	0.087	0.149	0.071
Cadmium (mg/1)	0.001	0.008	0.001
Chromium (mg/1)	0.029	0.013	0.04
Lead (mg/l)	0.045	0.027	0.008
Silver (mg/l)	0.001	0.001	0.0
Arsenic (µg/l)	6	ND(<0.005 mg/l)	0.01
Selenium (mg/l)	ND (<0.005)	ND (<0.005)	<0.01
Mercury (mg/l)	ND(<0.001)	ND(<0.001)	0.002



(11.6) Measured Groundwater Elevation (5.42)* Measured Groundwater Elevation in Lower Aquifer

B-1 Groundwater Monitoring Well DM-2 Previously Drilled Soil Test Boring

400 0 400 800 foot

Figure 1 Well Location Plan FMC BAYPORT PLANT LETCo Job No. HT-770-81G

ATTACHMENT A

EPA DRINKING WATER SUITABILITY PARAMETERS

	ELA DUTIN	LAKARETEKS			
			264.92		
	B-2	B-3	B-4		
	(35 Ft)	(35 Ft)	(40 Ft)	B-5	
EPA	Down-	Down-	Down-	(35 Ft)	Detection
Parameter Standard	gradient)	gradient)	gradient)	Upgradient	<u>Limit</u>
Arsenic 0.05 mg/1	ND	ND	ND	ND	0.002 mg/1
Barium 1.0 mg/1	ND	ND	ND	ND	0.5 mg/1
Cadmium 0.01 mg/1	0.01	0.01	0.01	0.01	0.005 mg/1
Chromium 0.05 mg/1	0.01	0.01	0.01	0.01	0.005 mg/1
Fluoride 1.4-2.4 mg/1	1.39	1.13	1.25	1.28	0.2 mg/1
Lead 0.05 mg/1	MD	ND	ND	0.004	0.003 mg/1
Mercury 0.002 mg/1	0.0056	0.0042	0.0042	ND	0.001 mg/1
¹ Resample	ND	ND	ND.	ND	
Nitrate 10 mg/1	0.07	0.07	ND	ND	0.05 mg/1
Selenium 0.01 mg/l	0.01	0.01	ND	0.01	0.005 mg/1
Silver 0.05 mg/l	0.01	0.01	0.01	0.01	0.005 mg/l
Endrin 0.002 mg/1	ND	ND	ИD	ND.	0.0002 mg/1
Lindane 0.004 mg/l	ND	ND	· ND	ND	0.002 mg/1
Methoxychlor 0.1 mg/l	ND	ND	ND	ND	0.005 mg/1
Toxaphene 0.005 mg/1	ND	ND	ND	ND	0.005 mg/1
2,4-D 0.1 mg/1	ND	ND	0.01	0.01	0.004 mg/1
2,4,5-TP Silvex 0.01 mg/1	0.005	0.005	0.005	0.005	0.002 mg/1
Radium 5pCi/l	> ND	$1.3 \pm 0.$	8 ND	ND	0.6 pCi/1
Gross Alpha 15pCi/1	ND	ND	ND	ND	2 pCi/1
² Gross Beta 4 Millirems/yr	7 <u>+</u> 2	3 ± 2 2 -	4 <u>+</u> 2 *	4 <u>+</u> 2	3 pCi/1
Coliform Bacteria Most Probable No.(MPN)	13	2 -	7	33	1 MPN

Sampled on 9/15/81 - Weather conditions sunny and hot $1_{\rm Sampled}$ on 10/27/81 - Weather conditions sunny and cool

 $²_{\text{Samples}}$ measured for concentration in pCi/1 and have not been converted to millirems/yr ND - Non Detectable

ATTACHMENT A

EPA DRINKING WATER SUITABILITY PARAMETERS

		~			
	B-2	40 CFR 2 B-3	, B-4	В-5	
	(35 Ft)	(35 Ft)	(40 Ft)	(35 Ft)	Detection
EPA Parameter	(Downgradient)	(Downgradient)	(Downgradient)	(Upgradient)	Limit
		ž.		•	• •
Chloride mg/1	97.0	94.0	117.0	300.0	1 mg/1
Iron mg/1	0.5	0.2	ND	MD	0.1 mg/1
Manganese mg/l	0.34	ND	ND	ND	0.05 mg/1
Phenols mg/l	ND	ND	ND	ND	0.1 mg/1
Sodium mg/1	126.0	122.0	85.2	522.0	0.01 mg/1
Sulfate mg/l	64.0	86.0	35,0	26.0	.1 mg/1

Sampled on 9/15/81 - Weather conditions sunny and hot ND - Non Detectable

ATTACHMENT A

EPA DRINKING WATER SUITABILITY PARAMETERS 40 CFR 264.92

EPA Parameter	B-2 (35 Ft) (Downgradient)	B-3 (35 Ft) (Downgradient)	B-4 (40 Ft) (Downgradient)	B-5 (35 Ft) (Upgradient)	Detection Limit
LILLI I CILCINIO COL					
pН					
Sample 1	7.39	7.58	7.44	7.45	•*
Sample 2	7.41	7.59	7.43	7.43	-
Sample 3	7.41	7.58	7.43	7.48	
Sample 4	7.42	7.57	7.44	7.50	
Mean	7.41	7.58	7.43	7.46	
Varience	0.0011	0.00005	0.00002	0.00072	
	•				
Specific Condu	ctance in umho/cm	•			
Sample 1	1240	1140	1270	1870	1 umho/cm
Sample 2	1240	1.160	1280	1840	1.7
Sample 3	1220	1160	1280	1870	
Sample 4	1220	1150	1300	1870	
Mean	1230	1152.5	1282.5	1862.5	
Varience .	100	68.8	118.8	168.8	
Total Organic	Carbon in mg/l				•
Sample 1	4	5	18	14	
Sample 2	3 .	7	. 17	21	1 mg/1
Sample 3	3	6	12	16	
Sample 4	4	5 ~	14	18	
Mean	3.5	5.9	15.4	17.30	
Varience	0.25	0.69	5.69	6.69	
Total Organic	Halogens in mg/l		_		
Sample 1.	30	12	33	65	10 mg/1
Sample 1	31	19	57	59	
Sample 3	20	27	31	98	
Sample 4	17	48	89	173	
Mean	24.5	26.5	52.5	98.8	
Varience	37.3	182.3	548.8	2058.2	

Sampled on 9/15/81 - Weather conditions sunny and hot

ATTACHMENT B

TABLE I.

EPA DRINKING WATER SUITABILITY PARAMETERS

40 CFR 264.92

	B-2	B-3	B-4	B-5	,
	35 ft	. 35 ft	40 ft	35 ft	Detection
FDA	Downgradient	Downgradient	<u>Downgradient</u>	<u>Upgradient</u>	Limit
EPA					
Parameter Standard					, ""
Arsenic 0.05 mg/l	ND	ND	ND	ND	0.005 mg/1
Barium 1.0 mg/l	0.6	0.51	0.58	ND	0.5 mg/l
Cadmium 0.01 mg/1	ND	ND ·	ND	ND	0.01 mg/l
Chromium 0.05 mg/l	ND .	מא	ND	ND	0.02 mg/l
Fluoride 1.4-2.4 mg/l	1.00	1.10	0.85	1.2	0.2 mg/1
Lead 0.05 mg/l	0.011	0.008	-MD	ND	0.005 mg/l
Mercury 0.002 mg/l	0.0014	ND	>ND	ND	0.001 mg/l
Nitrate 10 mg/l	ND	0.06	ND	ND	0.05 mg/l
Selenium 0.01 mg/l	- ND	ND	0.008	0.0065	0.005 mg/l
Silver 0.05 mg/l	ND	ND	ND	ND	0.02 mg/1
Endrin 0.002 mg/l	ND	ND	ND	ND	0.0002 mg/l
Lindane 0.004 mg/l	ND	ND	ND	ND	0.0002 mg/l
Methoxychlor 0.1 mg/l	ND	ND	ND	ND .	0.001 mg/l
Toxaphene 0.005 mg/l	ND	ND	ND	ND	0.002 mg/l
2.4-D 0.1 mg/l	ND	ND	ND ·	ND	0.0018 mg/l
2,4,5-TP Silvex 0.01 mg/l	ND	ND	ND	ND	0.0009 mg/l
*Radium 5pCi/l	ND	ND	ND	ND	
*Gross Alpha 15pCi/l	0:.± 11	1 ± 9	4 ± 9	1 ± 10	
*Gross Beta 4 millirems/yr	12 ± 9	1 ± 8	1 ± 8	3 ± 8	
Coliform Bacteria	6.78	6.8	<2	<2	1 MPN
Most Probable No. (MPN)					

ND = Non Detectable
Sampled on 2/11/82 and 2/12/82
Weather condition - partly sunny and mild
*Analysis in pCi/1

TABLE II.

EPA DRINKING WATER SUITABILITY PARAMETERS: 40 CFR 264.92

EPA Parameter	B-2 35 ft Downgradient	B-3 35 ft <u>Downgradient</u>	B-4 40 ft: Downgradient	B-5 35 ft Upgradient	Detection Limit
Chloride mg/l	87.0	67.0	97.0	220	1 mg/l
Iron mg/l	0.58	0.35	0.086	0.13	0.1 mg/l
Manganese mg/l	0.56	0.73	0.18	0.063	0.05 mg/l
Phenols mg/l	ND	ND	ND	ND	0.1 mg/l
Sodium mg/l	150	140	110	210	0.01 mg/l
Sulfate mg/l	15.0	12.0	30	5.5	1 mg/l

ND = Non Detectable

Sampled on 2/11/82 and 2/12/82

Weather conditions – partyly sunny and mild

ATTACHMENT B

TABLE III.

EPA DRINKING WATER SUITABILITY PARAMETERS

40 CFR 264.92

EPA Parameter	B-2 35 ft <u>Downgradient</u>	B-3 35 ft <u>Downgradient</u>	B-4 40 ft <u>Downgradient</u>	B-5 35 ft Upgradient	Detection Limit
pH Sample Replicate 1 Replicate 2 Replicate 3 Mean Variance	7.4	7.4	7.4	7.3 7.3 7.3 7.3 7.3 0.0	, _
Specific Conductance in umho/cm Sample Replicate 1 Replicate 2 Replicate 3 Mean Variance	1210	1080	-1291	1760 1760 1760 1760 1760 0.0	1 umho/cm
Total Organic Carbon in mg/l Sample Replicate 1 Replicate 2 Replicate 3 Mean Variance	3	10	· 30 · i	6 6 5 4 5.25 0.9175	1 mg/l
Total Organic Haolgens in µg/l Sample Replicate 1 Replicate 2 Replicate 3 Mean Variance	[*] 36	29	26	180 170 160 130 160 466.6	10 μg/1

Sampled on 2/11/82 and 1/12/82 Weather contitions - party sunny and mild

ATTACHMENT C Page 1 of 4

ECANODIS ANTINCINE OF MATER RESOURCES Shipping Control & Effluent Reports Unit Enforcement and Field Operations P. O. Box 13087, Capital Station Austin, Texas 78711



TDWR Generator's Registration No. or TSD. Facility Permit No.

EPA TSD Fac. No. or Gon. No.

2

GROUND WATER MONITORING REPORT	1
FOR HAZARDOUS WASTE FACILITIES	

To be completed by the owner/operator of a surface impoundment, landfill, or land treatment facility which is used to manage hazardous waste. (See reverse side for instructions.) Phone: (713) 474-4171 Company Name: FMC Corporation 77507 Business Address: 12000 Bay Area Blvd. Pasadena, Texas TABLE 1 1ron mg/l Grab Sulfate Parameter Units Sample Type Depth of p!-i Standard Conductivity CM Greb Total Organic Halogen mg/l Grab Chloride Manganese Sadium mg/l Grab mg/l Grab mg/l Grab mg/i Grab mg/l Grab Well Grab # 1 **First Year (initial) Background . arithmatic mean 15⁺ 35 ++ 94 0.35 0.64 < 0.1 156 0.048 3140 6/4/82

Parameter Units Sample Type	Arsenio mg/l Grab	Barium mg/l Grab	Cadmium mg/I Grab	Chromium mg/I Grab	Fluoride mg/l Grab	Le⊋d mg/l Grab	Mercury mg/l Grab	Nitrate mg/l Grab	Selenium mg/l Grab	Silver mg/l Grab
Date	4									
6/4/82	ND <0:01	ND <0.5	ND <0.01	ND <0.02	1.2 +	0.007	0,001	0.24	ND <0.01	ND <0.02
						,	4			
Parameter Units Sample Type	Endrin mg/i Grab	Lindane mg/I Grab	Methoxychlor mg/l Grab	Toxaphene mg/l Grab	2,4∙D mg/l Grab	2,4:5-T? SilveX mg/i Grab	Radium , pCi/i Grab	Gross Alpha pCi/I Grab	Gross Beta DC1/I Grab	Cohlorm Stylera FFN Grab
Date					,					
6/4/82	ND <0.0002	ND <0.000	ND <0.002	ND <0.005	ND <0.001	MD<0.0005	<2	<2	59 <u>+</u> 4	<2
	+≈ Sampled	on 8/6/82	· · · · · · ·							<u> </u>
 -		-	 - 🛉	· · — · —	 -					

certi	fy under penalty of law that I have personally exemined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals	
1	adjust, assessible for observation the information. I believe the submissed information is true adoleses and complete	

		•	CA Thomken	9-3-82
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19 BO .	Presided By		Signature of Authorized Agent	Da.

ATTACHMENT C Page 2 of 4

Shipping Control & Effluent Reports Unit Enforcement and Field Operations P. O. Box 13087, Capital Station Austin, Texas 78711



TOWR Generator's Registration No. or TSD-Facility Permit No. EPA TSD Fac. No.

or Gen. No.

8 3

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GROUND WATER MONITORING REPORT FOR HAZARDOUS WASTE FACILITIES

o be completed t	by the owner/opera		•	dfill, or land treati	ment facility whic	h is used to manag	e hazardous wasi	e. (See reverse side			4 43.71
ompany Name:		FMC_Carp							Phone:	(<u>713)</u> 47	4-41/1
usiness Address:		12000 Bay Area Blvd. Pasadena, Texas 77507									
ABLE 1						•					
Parameter Units Sample Type	Depth o	pH Standard Grab	Conductivity Imhos Ciril Grab	Total Organic Carbon mg/l Grab	Total Organic Halogen mg/l Grab	Chloride . mg/l ./ Grab	iron mg/l Grab	Manganesa mg/l Grab	Phenois mg/l Grab	Sodium mg/l Grab	Sulfate mg/l Grab
Date	4 1 1		. %	. :4				-	:	,	
••First Year (ini arithmatic mean	tial) Background	<u>+</u>	± **	± ••	± **	4				`	
6/4/82	35++	7.3+	1110 ⁺	4	0.027_	78+	0.6	0.99	<0:1	140	12+
					n'		·· ····				,
]		.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,				
					1			<u> </u>			

Parameter Units Sample Type	Arsenic mg/l Grab	Barium mg/l Grab	Cadmium mg/J Grab	Chromium mg/l Grab	Fluoride mg/l Grab	Lead nig/(Grab	Mercury mg/l Grab	Nitrate mg/l Grab	Selenium mg/I Grab	Silver mg/l Grab
Date										
6/4/82	ND<0.01	ND <0.5	ND<0.01	ND<0.02	1,2+	0.009	ND<0.001	0.17	'ND<0.01	ND<0.02
· · · · · · · · · · · · · · · · · · ·										' _
									<u> </u>	
		ļ	,		L					_
Parameter Units Sample Type	Endrin mg/t Grab	Lindane mg/l Grab	Methoxychlor mg/l Grab	Toxaphene mg/i Grab	2,4-D mg/i Grab	2,4;5·TP SilveX mg/l Grab	Radium , pCi/l Grab	Gross Alpha pCi/I Grab	p Gross Beta Grab	Celiform Bacteria IN PN Grab
Date	1				: 1	٠. ،				,
6/4/82	ND<0.0002	ND<0.0002	ND<0.002	ND<0.005	ND<0.001	ND<0.0005	5 ± 2	34±23 *	17±3	<2
	+=Sampled	on 8/6/82			,					
	[}	1	Ì	,]				1

1 certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals

certify under penalty of law that I have personally examined and an infimiliar with the information is true accurate and complete.

CA Thompson Steven Yuan Prepared By

9-3-82

*Considering the reliability and limited accuracy of the analytical method (as discussed in the TDWR 7/26/82 Houston Solid Waste Management Seminar) and the fact that FMC has never procussed or generated any radioactive material at the Bayport plant, we conclude that this does not represent groundwater contamination by FMC.

ATTACHMENT C Page 3 of 4

Shipping Control & Littleent Reports Unit Enforcement and field Operations F. O. Box 13087, Capitol Station Austin, Texas 78711



FOR HAZARDOUS WASTE FACILITIES

GROUND WATER MONITORING REPORT

91.7	WA C	acillo	y Pu	i flagi Imil l	strat io.	ion N	10,	3	.2.	6	1_	
PA TSD Fac. No. r Gen. No.		Х	<u>D</u>	0	8	3	5	.7.	0	0	5	

Company	Well	Number

B	4
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Gradient Up	Dawn	
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mpany Name:	by the owner/ope	FMC Cor		iolili, or land treat	ment facility whi	ch is used to man:	age hazardous was	te. (See reverse side			7/ /171
mpany ivame: sinoss Address:		12000 Ba	poration av Area Blv	d. Pasadei	na. Texas			······		: (<u>.713</u>)4 77507	74-4171
BLE 1			<u>., ,,, ,, ,, ,, ,, ,, ,, ,, ,, ,, ,, ,, </u>		,	****			Zıp:		
Parameter Units Sample Type	Depth of Well	pH Standard Grab	Sanductority 5 Chil Greb	Total Organic Carbon mg/i Grab	Total Organic Halogen mg/l Grab	Chloride mg/l Grab	lron mg/l Grab	Manganese mg/l Grab	Phenois mg/I Grab	Sodium mg/l Grab	Sulfate mg/l Grab
ate	t .	:	12. 12.	4 4	,	.;					
First Year (in ithmatic mean	itial) Background	±	±	± **	<u>+</u> ••			14, 1		-	
5/4/82	40 ++	7.0+	1350+	4	0.056	100+	0.14	0.34	<0.1	73.1	29+
		,			1,1						
				<u> </u>			<u> </u>				<u> </u>
BLE 2	<u> </u>	<u> </u>	<u> </u>	<u> </u>				<u> </u>			J
Parameter Units Sample Type	Arsenic rng/l Grab	Barium mg/l Grab	Cadmium mg/l Grab	Chromium mg/I Grab	Fluoride mg/l Grab	Lead mg/l Grab	Mercury mg/l Grab	Nitrate mg/I Grab	Selenium mg/i Grab	Silver mg/l Grab]
ite									. '		1
6/4/82	ND<0.01	ND<0.5	ND<0.01	ND<0.02	1.0 ⁺	ND<0.005	ND<0.001	ND<0.05	ND<0.01	ND<0.02	
					AT 17711-18-10-14-1111-L	<u> </u>				· · · · · · · · · · · · · · · · · · ·	<u> </u>
					,		<u> </u>		· ·		Ì
Parameter Units Jampie Type	Endrin : mg/l : Grab	Lindane mg/l Grab	Methoxychlor mg/l Grab	Toxaphene mg/i Grab	2,4-D mg/I Grab	2,4;5-TP SilveX mg/l Greb	Radium , pCi/I Grab	Gross Alpha pCi/I Grab	Gross Beta PC1 / I Grab	Coliform Deploys 11 11 11 11 11 11 11 11 11 11 11 11 11	~*
te	j		1		: :		-				
5/4/82	ND<0.0002	ND<0.0002	ND<0.002	ND<0.005		ND<0.0005	<2	52±26 *	18 [±] 3	4.0	Ì
	+=Sampled	on 8/6/82									
			<u> </u>	· · · · · · · · · · · · · · · · · · ·							

* Considering the reliability and limited accuracy of the analytical method (as discussed in the TDWR 7/26/82 Houston Solid Waste Management Seminar) and the fact that FMC has never processed or generated any radioactive material at the Bayport plant, we conclude that this does not represent groundwater contamination by FMC.

ATTACHMENT C Page 4 of 4

TEXAS DEPARTMENT OF WATER RESOURCES Shipping Control & Effluent Reports Unit Enforcement and Field Operations P. O. Box 13087, Capitot Station Austin, Texas 78711



GROUND WATER MONITORING REPORT

FOR HAZARDOUS WASTE FACILITIES

TOWR Gangrator's Registration No. or TSD Facility Permit No.

EPA TSD Fac. No. or Gen. No.

0

Gradient Up X

,		Report for: 1 2 19 8 2
To be completed by the owner	r/operator of a surface impoundment, landfill, or land treatment facility which is used to manage hazardous a	vaste. (See reverse side for instructions.)
Company Name:	FMC Corporation	Phone: (713) 474-4171
Business Address:	12000 Bay Area Bivd. Pasadena, Texas	Zip: 77507
TABLE 1		

•						743 747745				4'P:		
į	TABLE 1											
:	Units I	Depth of Well	pH Standard Grab	Conductivity Hyppy Coll Grab	Total Organic Carbon mg/l Grab	Talai Organic Halogen mg/l Grab	Chloride mg/l 's Grab	1ron mg/l Grab	Manganese mg/l Grab	Phenois mg/I Grab	Sodium mg/i Grab	Sulfate mg/l Grab
į	Date	4 \$					ä			· .	:	···
:	**First Year (initi arithmatic mean	iai) Background	<u>+</u> ••	<u>+</u> ••	<u>+</u> ••	± ••	· · · ·				•	
	6/4/82	35 ⁺⁺	7.4 ± 0 +	1637.5±25	5.5 ± 0.33	.026±.00025	250 ⁺	2,09	0.038	<0.1	218	5.8
			•			,						-
?	1.											
												

TABLE 2 Parameter Arsenic Barium Cadmium Chromium Fluoride Mercury Nitrate Lead Selenium Silver Units Sample Type mg/l Grab mg/l Grab mg/l Grab mg/I Grab mg/l Grab mg/t Grab mg/l Grab mg/l Grab Date 4.5 5/4/82 0.029 MD<0.5 ND<0.01 ND<0.02 1.3+ ND<0.005 0.05 ND<0,001 ND<0.01 ND<0.02 Parameter Endrin Lindane Methoxychlor 2,4,5-TF SilveX mg/l Grab 2,4·D Gross Aipha pCi/I Grab Toxaphene Radium Coliform Rectars MPM Gross Beta Units mg/l Grab mg/i Grab mg/l Grab mg/l Grab pCi/i Grab pCi/_bl Sample Type Date 6/4/82 ND<0.0002 ND<0.0002 ND<0.002 ND<0.005 ND<0.001 ND<0.0005 <2 29 ± 3 <2 +=Sampled on 8/6/82

c I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals

· · · · · · · · · · · · · · · · · · ·	responsible to optaining the information, I believe	that the submitted information is true, accurate and complete.	
н.	Steven Yuan	CA Thompson	9-3-82
2 0010	Propared By	Signature of Authorized Agent	0.00

Shipping Control & Effluent Reports Unit **Enforcement and Field Operations** P. O. Box 13087, Capitol Station Austin, Texas 78711



or TSD Facility Permit No.

or Gen. No.

8

Company Well Number

Down

Gradient Up

GROUND WATER MONITORING REPORT FOR HAZARDOUS WASTE FACILITIES

To be completed by the owner/operator of a surface impoundment, landfill, or land treatment facility which is used to manage hazardous waste. (See reverse side for instructions.)

Phone: (713) 474-4171 FMC CORPORATION Company Name:

77507 12000 Bay Area Boulevard, Pasadena, Texas **Business Address:**

TARLE 1

Parameter Units iple Type	Ground Water Elev. Pt. Sample MSI. Occurence	pH Standard Grab	Conductivity µmhos mg/l Grab	Total Organic Carbon mg/l Grab	Total Organic Halogen mg/l Grab	Chloride mg/l Grab	lron mg/l Grab	Manganese mg/l Grab	Phenols mg/I Grab	Sodium mg/l Grab	Sulfate mg/l Grab
 Date	÷					* * * * * *		·			
**First Year (ini- arithmatic mean	tial) Background	<u>+</u> **	+ **	<u>+</u> **	<u>+</u> **						
9/15/81	10.58	7.41 <u>+</u> .00011	1230 <u>+</u> 100	3.5 <u>+</u> 0.25	24.5	97	0.49	0.34	0.1	126	64
2/11/82	NA	7.4	1210	3	36	87	0.58	0.56	ND<0.1	150	15
6/4/82	NA .	7.2	1140	8	0,048	94	0.35	0.64	<0.1	156	15
9/17/82	9.25	7.7	1160	6	18	97	0.42	1.1	<0.1	160	17

TARLE 2

I ADLE Z				· · · · · · · · · · · · · · · · · · ·		· · · · · · · · · · · · · · · · · · ·	1			
Parameter Units Sample Type	Arsenic mg/l Grab	Barium mg/l Grab	Cadmium mg/l Grab	Chromium mg/l Grab	Fluoride mg/l Grab	Lead mg/l Grab	Mercury mg/l Grab	Nitrate mg/I Grab	Selenium mg/l Grab	Silver mg/l Grab
Date							,	,	`	
9/15/81	ND<0.002	ND<0.5	0.01	0.01	1,39	ND<0.003	ND<0.001	0.07	0.01	0.01
11/82	ND<0.005	0.6	ND<0.01	ND<0.02	1.00	0.011	0.0014	ND<0.05	ND<0.005	ND<0.02
6/4/82	ND<0.01	ND<0.5	ND<0.01	ND<0.02	1.2	0.007	0.001	0.24	ND<0.01	ND<0.02
9/17/82	ND<0.005	ND<0.5	ND<0.01	ND<0.02	1.1	ND<0.005	ND<0.002	0,17	ND<0.005	ND<0.02
Parameter Units Sample Type	Endrin mg/l Grab	Lindane mg/l Grab	Methoxychlor mg/l Grab	Toxaphene mg/I Grab	2,4-D mg/l Grab	2,4;5-TP SilveX mg/l Grab	Radium pCi/I Grab	Gross Alpha pCi/I Grab	Gross Beta PC1/1 Grab	Coliform MPAT ^{ria} Grab
Date										
9/15/81	ND<0.0002	ND<0.002	ND<0.005	ND<0.005	ND<0.004	0.005	ND	ND<2	.7 <u>+</u> 2	13
2/11/82	ND<0.0002	1	ND<0.001	ND<0.002	ND<0.0018	ND<0.0009	ND	0 <u>+</u> 11	12 <u>+</u> 9	6.8
6/4/82	ND<0.0002	ND<0.0002	ND<0.002	ND<0.005	ND<0.001	ND<0.0005	<2	<2	59 <u>+</u> 4	<2
9/17/82	ND<0.0002			ND<0.005	ND<0.001	ND<0.0005	<5	<2	6±2	<2

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true accurate and complete.

H. S. Yuan

Shipping Control & Effluent Reports Unit Enforcement and Field Operations P. O. Box 13087, Capitol Station Austin, Texas 78711



GROUND WATER MONITORING REPORT FOR HAZARDOUS WASTE FACILITIES

or TSD Facility Permit No.

Company Well Number	В	_	3

Report for:

To be completed by the owner/operator of a surface impoundment, landfill, or land treatment facility which is used to manage hazardous waste. (See reverse side for instructions.)

Company Name: FMC CORPORATION

Phone: (713)474-4171

Business Address: 12000 Bay Area Boulevard, Pasadena, Texas 77507

Parameter Units nple Type	Ground Water Elev. Pt. MST Sample Occurrence	pH Standard Grab	Conductivity Umhos mp/I Grab	Total Organic Carbon mg/i Grab	Tota) Organic Halogen mg/l - Grab	Chloride mg/l Grab	Iron mg/I Grab	Manganese mg/l Grab	Phenols mg/l Grab	Sodium mg/l Grab	Sulfate mg/l Grab
Date										,	
**First Year (ini	tial) Background	± **	± **,	± **	<u>+</u> **				* •.	•	
9/15/81	10.82	7.58 [±] 0	1152.5-68.8	5.85±.69	26.5	94	0.2	ND<0.05	0.1	122	86
2/11/82	NA	7.4	1080	10	29	67	0,35	0,73	ND<0.1	140'	12
6/4/82	NA ·	7.3	1110	4	0.027	78	0.6	0.99	<0.1	140	12
9/17/82	9.65	7.4	1066	5	19	76	0.31	0.74	<0.1	89	14

ABLE 2					F					<u></u>
Parameter Units Sample Type	Arsenīc mg/l Grab	Barium mg/l Grab	Cadmium mg/I Grab	Chromium mg/l Grab	Fluoride mg/l Grab	Lead mg/l Grab	Mercury mg/I Grab	Nitrate mg/I Grab	Selenium mg/l Grab	Silver mg/l Grab
Date	_			1.	:	: .				
9/15/81	ND<0.002	ND<0.5	0.01	0.01	1.13	ND<0.003	ND<0.001	0.07	0.01	0.01
11/82	ND<0.005	0.51	ND<0.01	ND<0.02	1.10	0,008	ND<0.001	0.06	ND<0.005	ND<0.02
6/4/82	ND<0.01	ND<0.5	ND<0.01	ND<0.02	1.2	0.009	ND<0.001	0.17	ND<0.01	ND<0.02
9/17/82	ND<0.005	ND<0.5	ND<0.01	ND<0.02	1 .1	ND<0.005	ND<0.002	0.16	ND<0.005	ND<0.02
Parameter Units Sample Type	Endrin mg/l Grab	Lindane mg/l Grab	Methoxychlor mg/l Grab	Toxaphene mg/l Grab	2,4-D mg/l Grab	2.4:5-TP SilveX mg/l Grab	Radium pCi/I Grab	Gross Alpha pCi/I Grab	Gross Beta PC1/1 Grab	Coliform MPN ¹² Grab
Date										
9/15/81	ND<0.0002	ND<0.002	ND<0.005	ND<0.005	ND<0.004	0.005	1.3±0.8	ND<2	3 [±] 2	2
2/11/82	ND<0.0002	ND<0.0002	ND<0.001	ND<0.002	ND<0.0018	ND<0.0009	ND	1 [±] 9	1 [±] 8	6.8
6/4/82	ND<0.0002	***************************************	ND<0.002	ND<0.005	ND<0.001	ND<0.0005	5 [±] 2	34 [±] 23*	17 [±] 3	<2
9/17/82	ND<0.0002	1	ND<0.001	ND<0.005	ND<0.001	ND<0.0005	<5	<2	3 [±] -2	4.5

*The replicat measurement was 33[±]13 Pci/L.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is trug, accurate and complete.



ATTACITEENT D - Page 3 OF T or TSD Facility Permit No.

EPA TSD Fac. N or Gen. No.

T.	Х	D	0	8	3	5	7	0	0	5	1

Company Well Number

Gradient Up

Report for: 1 2 19 8 2

GROUND WATER MONITORING REPORT FOR HAZARDOUS WASTE FACILITIES

To be completed by the owner/operator of a surface impoundment, landfill, or land treatment facility which is used to manage hazardous waste. (See reverse side for instructions.)

Company Name:

FMC CORPORATION

Phone: (<u>713)474-417</u>]

Business Address:

12000 Bay Area Boulevard, Pasadena, Texas

Zip: 77507

TABLE 1

Parameter Units nple Type	Ground Water Elev. FMSI SampleMSI Occurence	pH Standard Grab	Conductivity Jimhos mg/i Grab	Total Organic Carbon mg/l Grab	Totel Organic Halogen mg/l Grab	Chloride mg/l Grab	, Iron mg/l Grab	Manganese mg/I Grab	Phenois mg/I Grab	Sodium mg/I Grab	Sulfate mg/l Grab
Dare								-			
**First Year (ini	tial) Background	<u>+</u> **	<u>+</u> ++	+ **	<u>+</u> **			,			
9/15/81	11.56	7.43 ⁺ .0	1283 [±] 119	15.35 [±] 5.69	52.5	117	0.14	ND<0.05	0.1	85.2	35
2/11/82	NA	7.4_	1291	30	26	97	0.086	0.18	ND<0.1	110	· 30
6/4/82	NA	7.0	1350	4	0,056	100	0.14	0.34	<0.1	73.1	29
9/17/82	9.38	7.1	1281	6	12	100	0,093	0.24	<0,1	77	32

TABLE 2

Parameter Units Sample Type	Arsenic mg/l Grab	Barium mg/l Grab	Cadmium mg/I Grab	Chromium mg/l Grab	Fluoride mg/l Grab	Lead mg/l Grab	Mercury mg/l Grab	Nitrate mg/l Grab	Selenium mg/l Grab	Silver mg/l Grab
Date					·					
9/15/81	ND<0.002	ND<0.5.	0.01	0.01	1.25	ND<0.003	ND<0.001	ND<0.05	ND<0.005	0.01
′11/82	ND<0.005	0.58.	ND<0.01	ND<0.02	0.85	ND<0.005	ND<0.001	ND<0.05	0.008	ND<0.02
6/4/82	ND<0.01	ND<0.5	ND<0.01	ND<0.02	1.0	ND<0.005	ND<0.001	ND<0.05	ND<0.01	ND<0.02
9/17/82	ND < 0.005	$ND_{<}0.5$	ND<0.01	ND<0.02	0.89	ND<0.005	ND<0.002	ND<0.05	ND<0.005	ND<0.02
Parameter Units Sample Type	Endrin mg/l Grab	Lindane mg/l Grab	Methoxychlor mg/l Grab	Toxaphene mg/l Grab	2,4-D mg/t Grab	2,4;5-TP SilveX mg/i Grab	Radium pCi/l Grab	Gross Alpha pCi/I Grab	Gross Beta pCi/l Grab	Coliform Racteria MPN Grab
Date						•				
9/15/81	ND<0.0002	ND<0.002	ND<0.005	ND<0.005	0.01	0.005	ND	ND<2	4-2	7
2/11/82	ND<0.0002	ND<0.0002	ND<0.001	ND<0.002	ND<0.0018	ND < 0.0009	MD	4 [±] 9	1±8	<2
6/4/82	ND<0.0002	ND<0.0002	ND<0.002	ND<0.005	ND<0.001	ND<0-0005	<2	52 [±] 26*	18 [±] 3	4.0
	ND<0.0002	ND<0.0002	ND<0.001	ND<0.005	ND<0.001	ND<0.0005	<5	<2	5 [±] 2	<2

*The replicate measurement was 24[±]10 pCi/l

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, activate and complete.

H. S. Yuan

Signature of Authorized Agen

11/17/82

Shipping Control & Effluent Reports Unit Enforcement and Field Operations P. O. Box 13087, Capitol Station Austin, Texas 78711



GROUND WATER MONITORING REPORT FOR HAZARDOUS WASTE FACILITIES

or TSD Facility Permit No.

EPA TSD Fac. No. or Gen. No.

T	Х	D	0	8	3	5	7	0	0	5	1	_
							-					_

Company Well Number	
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Gradient Up

Down

Report for:

To be completed by the owner/operator of a surface impoundment, landfill, or land treatment facility which is used to manage hazardous waste. (See reverse side for instructions.) Phone: (713) 474-4171 FMC Corporation Company Name: _ 77507 12000 Bay Area Boulevard, Pasadena, Texas

TARLE 1

Business Address: _

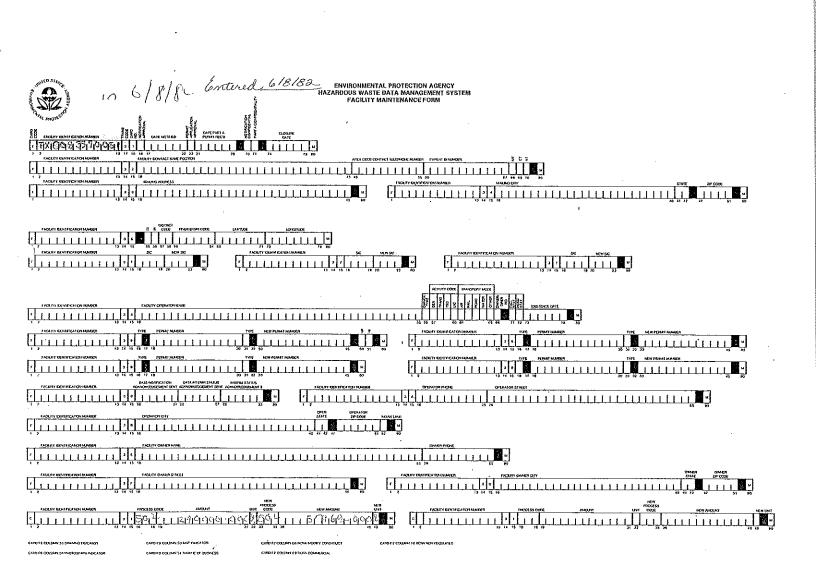
Parameter Units nple Type	Ground Water Elev. Ft. Sample MSI Occurence	pH Standard Grab	Conductivity µmhos mg/l Grab	Total Organic Carbon mg/l Grab	Total Organic Halogen mg/l Grab	Chloride mg/l Grab	lron mg/l Grab	Manganese mg/I Grab	Phenols mg/l Grab	Sodium mg/l Grab	Sulfate mg/l Grab
`wate											
**First Year (ini-	tial) Background	± 7.4±0 **	1704 [±] 135 [†] 2	8.5 [±] 25.8*	85 [±] 3261 **						· -
9/15/81	11.6	7.46± 0	1863 [±] 169	17.3 [±] 6.69	98.7 [±] 2058	300	0,16	ND<0.05	0.1	552	26
2/11/82	NA.	7.3 [±] 0	1760 [±] 0	5.25 [±] 0.92	160 [±] 466.6	220	0.13	0.063	ND<0.1	210	5.5
6/4/82	NA ·	. 7.4 [±] 0	1637.5 [±] 25	5.5 [±] 0.33	.026±0003	250	2.09	0.038	<0.1	218	5.8
9/17/82	9.4	7.42 [±] 0	1557±36	6±0	81.5-140.7	240	0.18	0.044	<0.1	240	5.8

ABLE 2	·					T	·	621.	C : .	Г
Parameter Units Sample Type	Arsenic mg/l Grab	Barium mg/l Grab	Cadmium mg/l Grab	Chromium mg/l Grab	Fluoride mg/l Grab	Lead mg/l Grab	Mercury mg/l Grab	Nitrate mg/l Grab	Selenium mg/l Grab	Silver mg/l Grab
Date			:,						,	
9/15/81	ND<0.002	ND<0.5	0.01	0.01	1.28	0.004	ND<0.001	ND<0.05	0.01	0.01
1/82	$ND_{<}0.005$	ND<0.5	ND<0.01	ND<0.02	1.2	ND<0.005	ND<0.001	ND<0.05	0.0065	ND<0.02
6/4/82	0.029	ND<0.5	ND<0.01	ND<0.02	1.3	ND<0.005	ND<0.001	0.05	ND<0.01	ND<0.02
9/17/82	ND<0.005	ND<0.5	ND<0.01	ND<0.02	1.2	$ND_{<}0.005$	$ND_{<}0.002$	100<0.05	$ND_{<}0.005$	$ND_{<}0.02$
Parameter Units Sample Type	Endrin mg/l Grab	Lindane mg/l Grab	Methoxychlor mg/l Grab	Toxaphene mg/I Grab	2,4-D mg/l Grab	2,4;5-TP SilveX mg/l Grab	Radium pCi/I Grab	Gross Alpha pCi/l Grab	Gross Beta PC1/1 Grab	Coliform MEN Grab
Date						:				
9/15/81	ND<0.0002	ND<0.002	ND<0.005	ND<0.005	0.01	0.005	ND	ND<2	4 [±] 2	33
2/11/82	ND<0.0002	ND<0.0002			ND<0.0018	ND<0.0009	ND	1±10	3±8	<2
6/4/82	ND<0.0002	ND<0.0002	1 .	'ND<0.005		ND<0.0005	<5	<2	29 [±] 3	<2
9/17/82	ND<0.0002	ND<0.0002		OND<0.005		ND<0.0005	<5	<2	3 [‡] 2	<2

I cestify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete.

H. S. Yuan

Prepared By



Entered 6/8/82 in 6/8/8

NG CAMP CODING FORM

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W	+	\vdash	+	Н	\dashv	+	+	H		4		\vdash			-	\dashv	╁	\vdash	\vdash	+	-1-	+	╀	┞	Ͱ	Н	Н	+	+	+	┞	╁	\dashv	+	+	H	\dashv	+	╁	-	Н	H	-+	+	+	+	\vdash	H	-		+	-	-	+	╁	H		- -	╁┼	+	- -	-	ď
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М	4	- -	-	+	\sqcup	+	+	Н	-1	4	-	4	+	+	\vdash	4	4	\vdash		-+	╁	-	╀	L	-	Н	\dashv	-	+	+	╂	\vdash	\dashv	+	╀	Н	+	+	╀		\coprod	H	-	+	╀	+	Н	Н	-	+		Н	4	+	+	Н	+	+	\coprod	+	 	Н	4
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FMC Corporation

Specialty Chemicals Division 12000 Bay Area Boulevard Pasadena Texas 77507 (713) 474 4171

February 18, 1982



EPA Region VI Attention: 6 AEP 1201 Elm Street First International Building Dallas, Texas 75270

Subject: Revised Hazardous Waste Permit Application

Gentlemen:

As part of the continuing FMC environmental review process, we have reevaluated our hazardous waste program and applications for our Bayport, Texas facility. We have reviewed both state and federal laws and compared our 1980 applications. Additionally, the State of Texas requested that we coorelate the existing TDWR waste code numbers with EPA hazardous waste numbers.

As we compared our 1980 applications, we noted that there were a number of inconsistencies between the state and federal applications. This was partially because of discrepancies between the regulations, and partially because of the minimal time available to prepare the applications for all FMC domestic operations. We have subsequently conducted additional analysis of all the previous identified wastes and having found some to be non-hazardous per EPA charateristic tests are now providing you with a revised application that reflects the results of the test work.

Attached you will find our revised application and a description of the changes and their justification. We wish to emphasize that there have been no process changes at the facility since the submittal of our hazardous waste application in 1980.

Also attached to this submittal you will find a copy of the first set of data required to be collected for surface impoundments under RCRA. As is shown in the results, all drinking water parameters were below the suggested criteria levels. In the case of mercury and fecal coliform, please note a re-sample was taken, as we believe the initial sample to be contaminated, and the second set of samples showed analysis under the drinking water criteria.

Very truly yours,

D. J. Covone Resident Manager

(fill-in areas are spaced for elite type, i.e.	The second secon			XU 08 357	0051	Form Approved	OMB No. 158	-R0175
FORM	GENER			AATION AGENCY		I. EPA I.D. NUMI	BER WIN	
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If the supplemental form is attached, I	f you answer "no" to e	ach ni	Jestion, y	ou need not submit :	any of these	forms. You may	answer "no" i	f varie activity
is excluded from permit requirements;	ce Section C of the inst	uction	is. See als	o, Section D of the i	nstructions f	or definitions of	bold—faced to	rms.
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C. Is this a facility which currently re	sults in discharge	17	19	D. Is this a propos	iters of the U	I.S.7 (FORM 2B)	├	19 20 2
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X. EXISTING ENVIRONMENTAL PERMITS				
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9 N	9 P		30	
B. UIC (Underground Injection of Fluids)	・ A Sale Selection HE			
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15 16 17 10) 0 3 0 4	New York Control of the Control of t	120 TONIN NEGISTE	O I VII
XI. MAP				
Attach to this application a topographic rethe outline of the facility, the location of treatment, storage, or disposal facilities, water bodies in the map area. See instruction	f each of its existing and pand each well where it injured	proposed intake and ects fluids undergrou	discharge structures, each	of its hazardous waste
XII. NATURE OF BUSINESS (provide a brief de				
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XIII. CERTIFICATION (see Instructions)	name - W		in farmer in the second	
I certify under penalty of law that I have attachments and that, based on my inqu application, I believe that the information false information, including the possibility	uiry of those persons imm n is true, accurate and con	nediately responsible oplete. I am aware t	for obtaining the inform	ation contained in the
NAME & OFFICIAL TITLE (type or print)	B. SIGNAT			C, DATE SIGNED
D. J. Covone, Resident Ma	nager Don	unik J. Cor	No. of the Comment of	2/18/82
COMMENTS FOR OFFICIAL USE ONLY				
DA Form 2510.4 /c 901	or the many contract of the second of the se			53

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle, If you

A. EPA HAZARDOUS WASTE NUMBER — Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle, if you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that weste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- 1 C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code, Units of measure which must be used and the appropriations are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE	CODE
	KILOGRAMS,	
TONS	METRIC TONS	. м

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking in: account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item 1, to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process code contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that posses that characteristic or toxic contaminant.

Note: Four spinces are provided for intering process codes, if more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extrame right box of item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

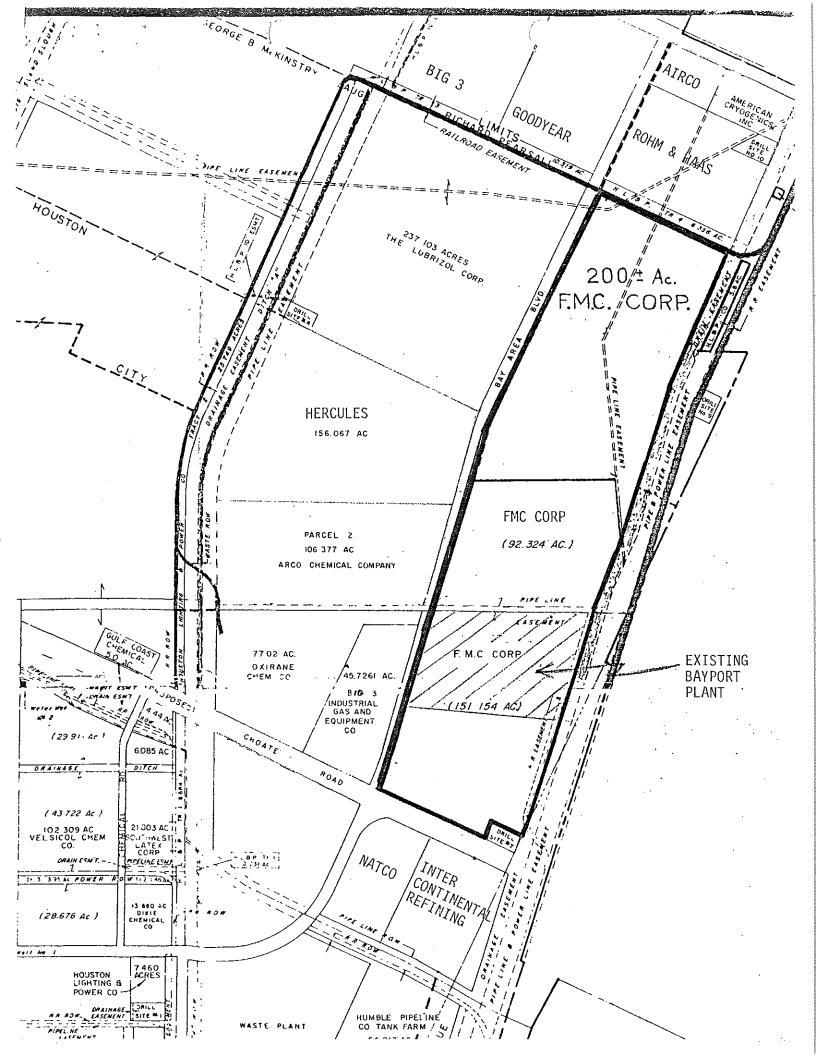
: NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

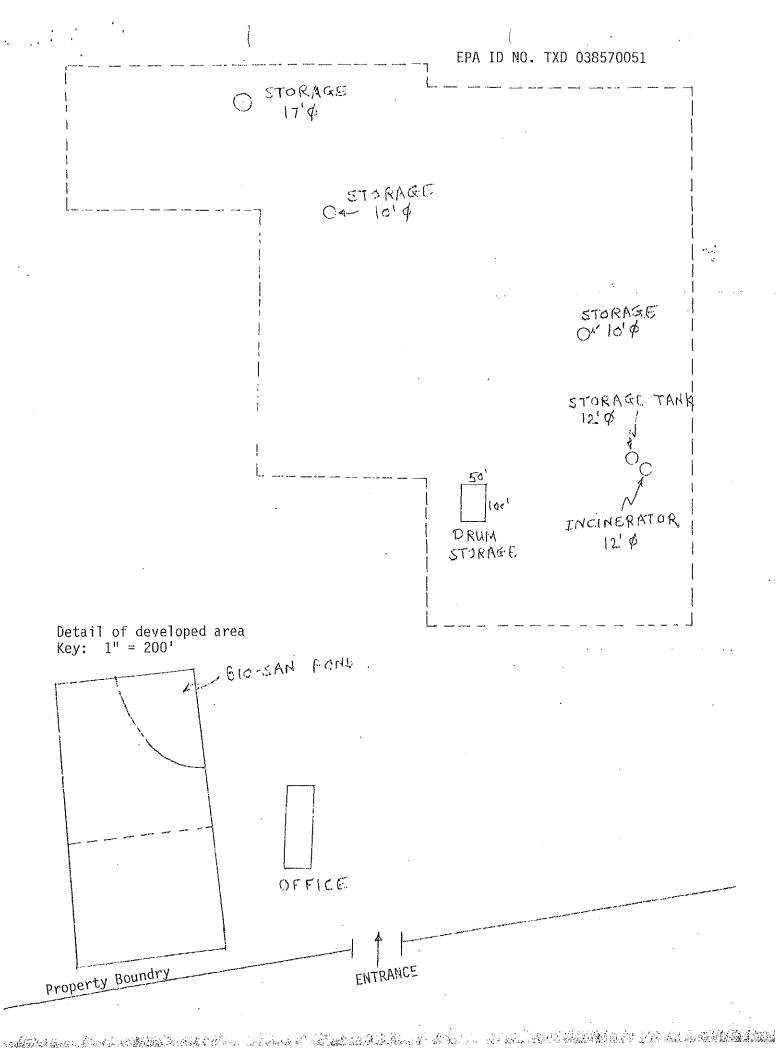
- 1. Select one of the EPA Hazerdous Wasse Numbers and enter it in column A. On the same line complete columns B.C. and D by estimating the total anno quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pound. I per year of chrome shavings from leathor tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

				O.				u١			,												D. PROCESSES
ZONE NO.	W	٨.	Ś٦		4O	B. ESTIMATED ANNUAL QUANTITY OF WASTE	S	U H	er				1			CE! (en			DE:	5			2. PROCESS DESCRIPTION (If a code is not entered in D(1))
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X-2	D		0	0	2	400	-	P		7	1.	o^{\prime} .	3	D	8	0		T	1		1	T	
X-3	D)	0	Û	1	100		P		1	` (0^{-}	3	D^{1}	8	0	 	1	1		7	Υ	
X-4	L	,	0	0	ر 1						T	1			1			T	1		1	Ī	included with above

IV. DESCRIPTION OF HAZARDOUS W,, FES (co		M ITEM D(I) ON PA	AGE 3.		
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- Articles					
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					•
EPA I.D. NO. (enter from page 1)					
T T X D 0 8 3 5 7 0 0 5 1 6					
All existing facilities must include in the space provided on	page 5 e scele drawing	of the facility (see insti	uctions for more	detoil).	
VI. PHOTOGRAPHS All existing facilities must include photographs (aer	ial or ground—level)	that clearly delineat	e all existing st	ructures; existing s	torage,
treatment and disposal areas; and sites of future sto	rage, treatment or d	sposal areas <i>(see ins</i>	tructions for m	ore detail).	
LATITUDE (degrees, minutes, & second.	3)	LON	GITUDE (degree:	, minutes, & seconds)	
2 9 3 7 0 3 0			0950	2 0 3 0	-
VIII. FACILITY OWNER	是一种的人的				
(X) A. If the facility owner is also the facility operator as skip to Section 1X below.	listed in Section VIII o	n Form 1, "General Inf	ormation", place	an "X" in the box to	the left and
B. If the facility owner is not the facility operator as	listed in Section VIII or	Form 1, complete the	following items	•	
c	LITY'S LEGÁL OWNE	FR	, , , , , , , , , , , , , , , , , , ,	2. PHONE NO.	arca code &
E 11 14				55 56 - 58 39 -	61 62
3. STREET OF P.O. BOX	c	4. CITY OR TOWN		5. ST. 6. Z	P CODE
12 13	G	iv estimentalisi			
IX. OWNI R CERTIFICATION I certify under penalty of law that I have personally documents, and that based on my inquiry of those is submitted information is true, accurate, and comple including the possibility of fine and imprisonment.	ndividuals immediate	ely responsible for o	btaining the im	formation, I believe	that the
D. J. Covone	11. SIGNATURE	ik J Cown	_	2/18/8	- 2
X, OPERATOR CERTIFICATION					
nertify under penalty of law that I have personally a couments, and that based on my inquiry of those is submitted information is true, accurate, and comple including the possibility of fine and imprisonment.	ndividuals immediate	ely responsible for oi	btaining the int	formation, I believe	that the
A. NAME (print or type)	B. SIGNATURE			C. DATE SIGNED	
EPA Form 3510-3 (6-80)	PAGE 4	OF 5		CONT	INUE ON P.





-- 2100 Feet --Property Boundary Property Boundary 8800 Feet --Property Boundary 300 5501 0 11001 Property Boundary -- 2100 Feet --

CILITY DEAMING FMC BAYPORT

> Key Inne

= 1000 Feet

Treatment and Storage Facilities

CHANGES TO FEDERAL APPLICATION

(line numbers refer to the 1980 submittal)

Page 1 of 5

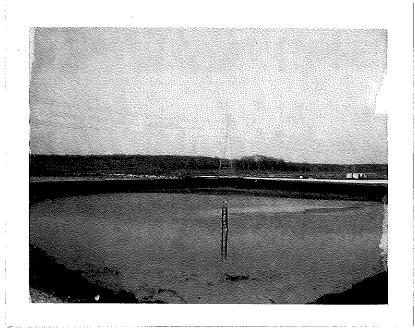
- 1. Line 1 Volume reduction. This reduction is based on two factors. We have reexamined our in-plant storage tanks and their associated volumes. Additionally, some storage volume previously accounted for is no longer applicable because the material stored is and was not a hazardous waste.
- Line 5 Surface impoundment has been eliminated because it does not contain any hazardous waste. Impoundment previously listed because it contained blowdown from a cooling tower that used chromate for slime control. The chromate treatment has been discontinued. Bottom sludge and water were analyzed and found not to be EP toxic. Therefore, the pond and the cooling tower blowdown have been eliminated from this application.

Page 3 of 5

- 1. Line 1 Material is unchanged. Review indicated the wrong quantity had been reported previously.
- 2. Lines 2-8 Material unchanged. Previous identification now seems inaccurate. Material was tested and found to be ignitable (D001) under EPA criteria. This stream is incinerated in our on-site liquid incinerator.
- Line 9 Material is found on Line 3 of revised form. No change has been made.
- Lines 10-11 Material was tested and found not to be a hazardous waste by any EPA criteria. Material is spent alumina from hydrogen peroxide unit.
- 5. Lines 12-14 Material was tested and found not to be hazardous by any EPA criteria. Previously identified by codes applicable to components of mixture; all components were found in trace or low levels.
- Lines 15-16 Material was tested and found not to be hazardous by any EPA criteria. Material is wastewater that contains a trace (less than 1 percent) of the commercial products previously identified.
- 7. Line 17 Material was tested and found not to be hazardous by any EPA criteria. Material is spent activated carbon from the hydrogen peroxide and glycerine units.
- 8. Lines 18-20 Material was tested and found to be ignitable. We feel this is a more accurate representation than the previous designation. Material is found on Line 4 of the revised form.

- 9. <u>Line 21</u> This material has been reported on Line 5 of the revised form. It is unchanged from the original submittal.
- 10. Line 22 This has been eliminated from the revised submittal. The designation referred to the cooling tower blowdown that had been presumed to be EP toxic (D007). Subsequent testing and a change in slimicide have eliminated this waste stream.
- 11. Line 6 of the revised application designates the combined wastewater stream that is piped to the Gulf Coast Waste Disposal Authority regional treatment plant for treatment. This stream contains the material found in Line 5 of the revised form. Although testing has shown it is not hazardous under any EPA criteria, it contains the same designation as Line 5.

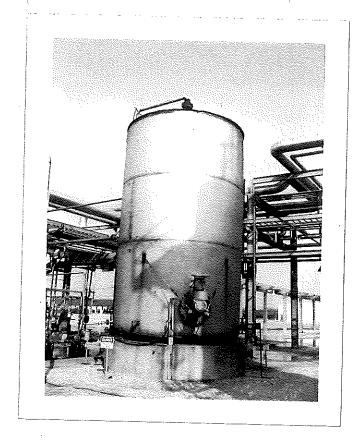
r45B4 md62



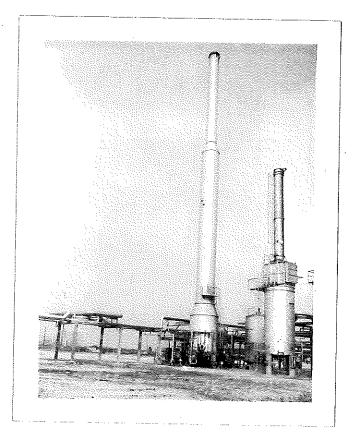
SURFACE IMPOUNDMENT (BIO-SAN POND)



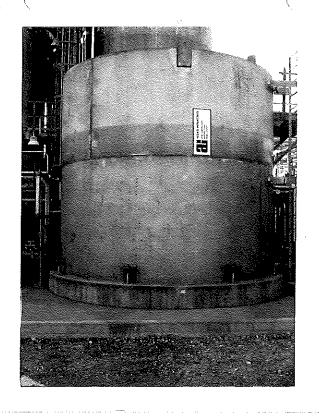
T-6428 (SPENT CAUSTIC STORAGE TANK)



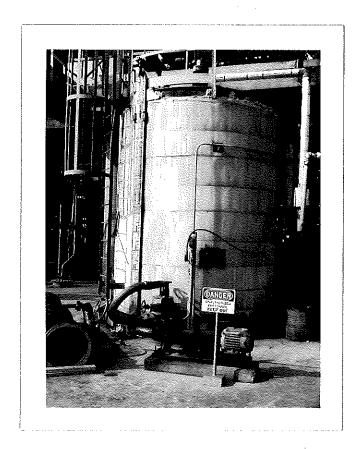
INCINERATOR FEED TANK



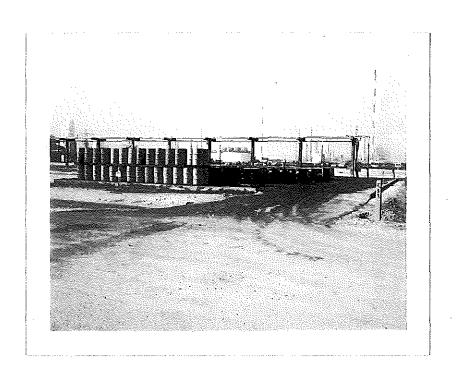
INCINERATOR



T-9304 (RECOVERED PURGE STORAGE TANK)



GLYCERINE STILL BOTTOMS STORAGE TANK



DRUM STORAGE AREA

5000°

LOSS OF INTERIM STATUS REGION VI EPA RO6-01-06

1.	Reviewer:	<u>D6,5</u>			· · · · · · · · · · · · · · · · · · ·	
2.	Facility name:	FMC CORP	DRATION			
3.	Address/location:					• • • • • • • • • • • • • • • • • • • •
		PASADENA				
						,
4.	EPA I.D. No.:	IXD083570	0051			
5.	Type of RCRA units requiring certification	ation:				
	A.* ST - "BIO-S	ANPOND"	н.			
	В					
	c	·	J	·		-
	D		к.	<u> </u>		-
	E	·	L	· · · · · · · · · · · · · · · · · · ·		<u> </u>
	F		м			
•	G		N	· · · · · · · · · · · · · · · · · · ·		
	* see 22			Yes	No	Not Determined
6.	Is groundwater cerrequired? If yes, Question 7. If no 22.	continue to	-		☑	
7.	Is financial assuration required? If to Question 8. If Question 22.	yes, continue			Ø	,

						*
g-						
			Yes	No	Not	
	8.	Was groundwater certification submitted? If yes, continue to Question 9. If no, answer Questions 9, 10, 11, and 12, and go to Question 20.			Determined	
	9.	Was financial assurance certification submitted? If yes, continue to Question 10. If no, answer Questions 10, 11, and 12 and go to Question 20.				/
	10.	Is signature adequate? If yes, continue to Question 11. If no, answer Questions 11 and 12 and go to Question 22.				•
	11.	Documentation available?				
		a. Part A Submittal - Date: \(\frac{10-83}{11-19-65} \) b. Part B Submittal - Date: \(\frac{10-83}{11-19-65} \) c. Topographic Map - d. Section 3007 Response - Date: \(\frac{11-18-85}{11-18-85} \) e. Closure Plan - Date: \(\frac{10-85}{11-18-85} \) e. Closure Plan - Date: \(\frac{10-83}{11-19-85} \) f. Post-Closure Plan - Date: \(\frac{10-83}{11-19-85} \) h. Other - \(\frac{10-83}{11-19-85} \) ii. \(\frac{10-83}{11-19-85} \) Date: \(\frac{10-83}{11-19-85} \) lii. \(\frac{10-83}{11-19-85} \) Date: \(\frac{10-83}{11-19-85} \) lii. \(\frac{10-83}{11-19-85} \) liii. \(\frac{10-83}{11-19-85} \) Date: \(\frac{10-85}{11-18-85} \) D	Receive			
	12.	Do all documents listed in Question 11 agree with the information shown in Question 5? If yes, continue to Question 13. If no, go to Question 22 and check with Project Manager before continuing with questionnaire.	.			
	13.	Does groundwater certification properly address all units listed in Question 5? If yes, continue to Question 14. If no, go to Question 22.				

			Yes	No	Not Determin	ned
14.	Does financial assurance certification (insurance and closure/post-closure) properly address all units listed in Question 5? If yes, continue to Question 15. If no, go to Question 22					
15.	Does insurance address both sudden and non-sudden occurrences? If yes, continue to Question 16. If no, go to Question 22.	1 + 4				
16.	Which of the following options were	Closure Cost		_	insurance rt B	Aveilable
	used to demonstrate financial assurance for closure? Note: check yes for the appropriate method - it is not necessary to check No for those which do not apply.	<u> </u>				
	a. Closure trust fund:				П	
	b. Surety bond guaranteeing payment into a closure trust fund:					
-	c. Surety bond guaranteeing performance:					
	d. Closure letter of credit: e. Closure insurance: f. Financial test/corporate					
	guarantee:	•				٠.
	<pre>g. Multiple financial mechanisms:</pre>					
17.	Which of the following options were	Post CLOS	URE —	_	+ B	Available
	used to demonstrate financial assurance for post-closure? Note: Check yes for the appropriate method - it is not necessary to check no for those which do	• .				

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					-		
•							
		•		Yes	No	Not Determined	
		a. Post-closure trust fund:b. Surety bond guaranteeing					
		payment into a post-closure trust fund:	•				
		c. Surety bond guaranteeing performance:d. Post-closure letter of					÷ <u>-</u>
	. ,	credit: e. Insurance:					
	4	f. Financial test/corporate guarantee: g. Multiple financial				. 0	
		g. Multiple financial mechanisms:					٠.
	18.	Is certification considered complete? If no, explain in Question 22.					
	19.	Is financial assurance considered complete? If no, explain in Question 22.					
	20.	If the answer to Questions 8, 9, 18, or 19 is no, was a closure plan submitted? If yes, continue to Question 21. If no, go to Question 22.					
	21.	If the answer to Questions 8, 9, 18, or 19 is no, was a post-closure plan submitted?					
·	22.	Briefly discuss the problems or discredetermine if they are of a nature which $e^{\lambda e A \hat{p}^{\prime}}$	epancies id th prevents	denti s fur	fied ther	and review.	
		· LLNIT WAS CLOSED MAY 1984. C.	DSURELE	RTIF	ICA	TION	
		SUBMITTED TO TOWR July 1984.	(TDUR	NSP	ect	ONOF	
		Closed UNIT - MAY 29-30,1984)		·	-		
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Generator Biennial Hazardous Waste Report for 1985 (cont.)

This report is for the calendar year ending December 31, 1985

GENERATOR'S NAME:

FMC Corporation, Bayport, Texas Plant

'Date rec'd:...' Rec'd by:

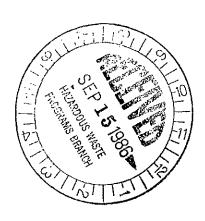
XV. GENERATOR'S EPA I.D. NO.

XVI. WASTE MINIMIZATION (narrative description)

In accordance with FMC's corporate policy and corporate program, Bayport plant has a program in place to reduce the volume and toxicity of hazardous waste generated at the facility. For 1985, implementation of this program at the facility consisted of the following:

- Identification of the amount, nature and source of hazardous waste generated at the facility.
- b. Exploration of means of reduction, including alternative production means and/or use of alternative materials.
- Burning non-halogenated organic waste via the Hot Oil Furnace (an industrial boiler) as fuel for energy recovery.
- Termination of using landfill disposal of "Spill Clean Up-Miscellaneous Organics" waste. This waste has been disposed/treated via an off-site incinerator to reduce its toxicity since July, 1985.





Appendix-Form-Notification of Hazardous Waste Activity

EPA Form 8700-12 (Revised 11/85) Form Approved. OMB No. 2050-0028, Expires 9-30-88. GSA No. 0246-EPA-01 Please print or type with ELITE type (12 characters per inch) in the unshaded areas only Please refer to the Instructions for Filing Natification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act). United States Environmental Protection Agency Washington, DC 20460 Notification of Hazardous Waste Activity **"学会文法"**》 Comments c Date Received Installation's EPA TD Number (vr Approved mo. I. Name of Installation 0 0 II. Installation Mailing Address Street or P.O. Box 0 O n В В 0 E City or Town State ZIP Code 5 N Street or Route Number State ZIP Code City or Town IV. Installation Contact Name and Title (last, first, and job title) Phone Number (area code and number, S R E V. Ownership A. Name of Installation's Legal Owner B. Type of Ownership (enter code) VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.) A. Hazardous Waste Activity B. Used Oil Fuel Activities XX 1a. Generator 6. Off-Specification Used Oil Fuel LJ 1b, Less than 1,000 kg/mo. (enter 'X' and mark appropriate boxes below) 2. Transporter X3. Treater/Storer/Disposer a. Generator Marketing to Burner 4. Underground Injection b. Other Marketer 5. Market or Burn Hazardous Waste Fuel (enter 'X' and mark appropriate boxes below) 🗌 c. Burner a. Generator Marketing to Burner 7. Specification Used Oil Fuel Marketer D b. Other Marketer (Or On-Site Burner) Who First Claims the Oil Meets the Specification. VII, Waste Fuel Burning: Type of Combustion Device (enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.) XX B. Industrial Boiler C. Industrial Furnace VIII. Mode of Transportation (transporters only — enter 'X' in the appropriate box(es) ☐ A Air . ☐ B. Rail C. Highway D. Water E. Other (specify) IX. First or Subsequent Notification Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA'ID Number in the space provided below. C. Installation's EPA ID Number A. First Notification XXB. Subsequent Notification (complete item C) 8 3

EPA Form 8700-12 (Rev. 11-85) Previous edition is obsolete.

0 Continue on reverse

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D

			· .	ID -	- For Official Use Only		
-				c w		T/A C	
ΠX	Description of Ha	zardous Wastes (co	ntinued from fro	nt)		14 To 1 To	
		Nonapecific Sources. I	nter the four-digit no	mber from 40 CFR Part 20	61.31 for each listed hazar	dous waste	
┢	1	2	3	4	5	6	
	F 0 0 3						
1	7	8	9	10	11	12	
L							
	Hazardous Wastes from specific sources your ins			er from 40 <i>CFR</i> Part 261.3 cessary.	2 for each listed hazardou	s waste from	
	13	14	15	16	17	18	
•	19	20	21	22	23	24	
İ	25	26	27	28	29	30	
				git number from 40 CFR Pronal sheets if necessary.	art 261.33 for each chemic	cal substance	
	31	32	33	34	35	36	
	37	38	39	40	41	42	
	43	44	45	46	47	48	
				ert 261.34 for each hazard Use additional sheets if ne		veterinary hos-	
_	49	50	51	52	53	54	
E. (E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)						
	X1. Ignitable		2. Corrosive (D002)	3. Reactive (D003)		4. Toxic (D000)	
X.	Certification C			(12003)			
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.							
Sig	Signature Name and Official Title (type or print) Date Signed R. C. Threde - Resident Manager 3/19/86						
10							

[Editor's note]

Joil Mad

File I A6

C-LOHRS.

LOSS OF INTERIM STATUS REGION VI EPA RO6-01-06

١.	Reviewer:	<u>D</u> 6,5						
2.	Facility name:	FMC CORPORATION						
3.	Address/location:	- '	000 Bay AREA BLUD.					
		PASADENA,						
4.	EPA I.D. No.:		<i>0</i> 05					
5.	Type of RCRA units							
	A.* ST - "BIO-	SANPOND"	Н.					
	В.		_					
	c		J.					
			Κ.					
	_		L.					
			М.					
			N.					
	* see 22				Yes	No	Not Determined	
5.	Is groundwater cer required? If yes, Question 7. If no 22.	continue to	n					
7.	Is financial assurtion required? If to Question 8. If Question 22.	yes, continue				Ø	,	

		Yes	Мо	Not Determined
st Qu	as groundwater certification ubmitted? If yes, continue to uestion 9. If no, answer Questions , 10, 11, and 12, and go to Question 20.			. 🗆
s:	as financial assurance certification ubmitted? If yes, continue to Question O. If no, answer Questions 10, 11, nd 12 and go to Question 20.			
co ar	s signature adequate? If yes, ontinue to Question 11. If no, assure that is a substitution of the substitu			
a. b. c. d.	Part 3 Submittal - Date: Topographic Map - Section 3007 Response - Date: Closure Plan - Date: Post-Closure Plan- Date: RCRA Inspection - Date: Other -	A D D D D D D D D D D D D D D D D D D D		
11 in Qu 22	all documents listed in Question agree with the information shown Question 5? If yes, continue to Westion 13. If no, go to Question Cand check with Project Manager Office continuing with questionnaire.			
ad If	des groundwater certification properly dress all units listed in Question 5? byes, continue to Question 14. no, go to Question 22.			

→

			Yes	No	Not Determin	ned
14.	Does financial assurance certification (insurance and closure/post-closure) properly address all units listed in Question 5? If yes, continue to Question 15. If no, go to Question 22					
15.	Does insurance address both sudden and non-sudden occurrences? If yes, continue to Question 16. If no, go to Question 22.					
16.	Which of the following options were used to demonstrate financial assurance for closure? Note: check yes for the appropriate method - it is not necessary to check No for those which do not apply.	Closure			nsurance rt B	Available
	a. Closure trust fund:b. Surety bond guaranteeing payment into a closure trust fund:					
	 c. Surety bond guaranteeing performance: d. Closure letter of credit: e. Closure insurance: f. Financial test/corporate guarantee: g. Multiple financial mechanisms: 					·
17.	18. 1 . 1 . 1 . 1 . 1	POST CLOS	ORE .	Par	MSURANCE † B	Available

		Yes	No	Not Determined
	a. Post-closure trust fund:			
Ē	Surety bond guaranteeing payment into a post-closure trust fund:			
	Surety bond guaranteeing performance:			
	<pre>l. Post-closure letter of credit:</pre>			
	e. Insurance: Financial test/corporate guarantee:			
ę	Multiple financial mechanisms:			
C	Something the considered complete? If no, explain in question 22.			
C	s financial assurance considered complete? If no, explain in question 22.			
1 p t	f the answer to Questions 8, 9, 8, or 19 is no, was a closure lan submitted? If yes, continue to Question 21. If no, go to Question 22.			
7	f the answer to Questions 8, 9, 8, or 19 is no, was a post- losure plan submitted?			
A	riefly discuss the problems or discrepancies tetermine if they are of a nature which prevent		مدمطة	mared and
•	LLUIT WAS CLOSED MAY 1984. CLOSURE CE	PRTIF	ICA	TION
	SUBMITTED TO TOWR JULY 1984. (TOWR	INSC	ect	10 N OF
	CLOSED UNIT - MAY 29-30, 1984)	·		
•				
				
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PERMIT NO. HW-50216

CONTINUATION SHEET 2 OF 25

EPA I.D. NO. TXD 083570051

NAME: FMC - Peroxygen Chemicals Division

I. Size and Location of Facility

- A. The FMC Peroxygen Chemicals Division waste management facility is located on a 427-acre tract of land that fronts on the east side of Bay Area Boulevard, approximately 1.8 miles south of the intersection of Fairmont Parkway and Bay Area Boulevard in Pasadena, Harris County, Texas. The site is in Segment Number 1113 of the San Jacinto-Brazos Coastal Basin (North Latitude 29°37′30" West Longitude 95°02′30").
- B. The area on which waste management activities governed by this permit are located is described by the attached legal descriptions (Attachment A).

II. Units and Operations Authorized

A. Wastes Authorized:

1. The permittee is authorized to manage industrial solid wastes listed in the application and described herein, subject to the limitations provided herein.

Wastes are limited to those generated at this facility.

- Hazardous wastes authorized to be managed under this permit are limited as follows:
 - a. Hazard Code Groups (as prescribed by the U.S. Environmental Protection Agency regulations in effect upon the date of permit approval):

x Ignitable Waste (I) Toxic Waste (T) Corrosive Waste (C)	Acute Haz EP Toxic Reactive	\ -/
Waste Descriptions	TWC Waste Class	Hazard Code

(1) Spent methanol

IH I

B. Units Authorized:

b.

The permittee is authorized to operate the following units for storage and incineration subject to the limitations contained herein. All waste management activities subject to permitting are to be confined to the following units:

1. Tank, stainless steel closed, maximum capacity of 38,000 gallons, identified as Spent Methanol Tank MS-211 in the application (NOR No. 06) for storage of wastes described in <u>Provision II.A.2.b.</u>;

PERMIT NO. HW-50216 CONTINUATION SHEET 3 OF 25

EPA I.D. NO. TXD 083570051

NAME: FMC - Peroxygen Chemicals Division

[II.B.]

2. Incinerator, liquid injection-type, 20,000,000 BTU's per hour, identified as John Zink Thermal Oxidizer HF-702 in the application (NOR No. 01), for processing wastes described in <u>Provision II.A.2.b.</u>

- C. Authorization to operate these units is contingent upon maintenance of financial assurance pursuant to <u>Provision IV.A.l.</u> and financial liability requirements pursuant to <u>Provision III.B.ll.</u> Authorization to begin operation of new units is contingent upon compliance with <u>Provisions IV.A.l.</u> and <u>V.U.</u> The permittee may not store, process, or dispose of waste unless compliant with all financial assurance requirements and liability requirements, to include all related financial assurance instruments and liability coverage instruments being in full force and effect.
- D. The units and operational methods authorized are limited to those described both herein and by the application and related plans and specifications which were included in the permit application submittals dated January 6, 1989. Prior to constructing or operating any unit in a manner which differs from either the related plans and specifications or the limitations of this permit, the permittee must satisfy the following requirements:
 - 1. Notify the TWC and submit plans and specifications for the proposed modification; and
 - 2. Receive written authorization of the Executive Director for such modification, if the Executive Director determines that a permit amendment is not required by TWC rules.
- E. Any proposed unit modifications, addition of units, or expansion in capacity which has not been addressed by the terms of this permit must be authorized in accordance with TWC permit amendment rules.

III. Facility Design, Construction, and Operation

- A. General Design, Construction, and Certification Requirements:
 - 1. Facility design, construction, and operation must comply with this permit, Texas Water Commission (TWC) Rules, and be in accordance with the plans and specifications for design, construction and operation approved herein. All plans submitted with the application dated January 6, 1989 are approved, subject to the terms of this permit and any other orders of the Texas Water Commission which are hereby incorporated by reference and made a part of this permit.

CONTINUATION SHEET 4 OF 25

PERMIT NO. HW-50216

EPA I.D. NO. TXD 083570051

NAME: FMC - Peroxygen Chemicals Division

[III.A.]

- 2. The facility shall be designed, constructed, operated, and maintained to prevent washout of any hazardous waste. At a minimum, all storm-water control structures shall be designed and constructed to prevent washout of any hazardous waste by a 100-year flood.
- 3. All authorized units shall be clearly identified as numbered in Provision II.B.. At a minimum, the incinerator area is to have signs, and the tank is to have painted labels indicating "TWC PERMIT UNIT NO. (from Provision II.B.)," (for example, the Spent Methanol Tank MS-211 shall be labelled "TWC PERMIT UNIT NO. 1").
- B. General Operational Requirements:
 - The permittee shall comply with the requirements of 40 CFR 264.17.
 - 2. The permittee shall within 24 hours remove any spilled hazardous waste and waste residues and shall take steps necessary to prevent surface-water contamination as a result of any spills.
 - 3. The permittee shall manage all wastes within the facility unit in a manner in which particulate emissions of waste to the air meet Texas Air Control Board and Texas Water Commission requirements.
 - 4. All contaminated water as identified by <u>Provisions III.B.5.</u>, <u>IV.B.2. and IV.B.3.</u> shall be disposed of by one of the following methods:
 - Removal to an on-site, authorized industrial solid waste unit; or
 - b. Removed off-site to an authorized industrial solid waste management facility.
 - c. Removed off-site to Gulf Coast Waste Disposal Authority or other publicly-owned treatment works, for treatment and discharge under terms and conditions of indirect discharge authorization.
 - 5. The permittee shall ensure that any equipment which has come in contact with hazardous waste has been decontaminated prior to exiting the unit. At a minimum, all contaminated equipment shall be washed sufficiently to remove waste residues. All wash water generated shall be collected and disposed of in accordance with Provision III.B.4.

PERMIT NO. HW-50216

EPA I.D. NO. TXD 083570051

NAME: FMC - Peroxygen Chemicals Division

[III.B.]

- 6. The annual site activity report required by <u>Provision V.F.</u> shall be submitted to the TWC Central Office and Southeast Region Office by January 25 of each year for the preceding year's activities. This annual report shall include, at a minimum, the following information:
 - a. All information and records required by 31 Texas Administrative Code (TAC) 335.154;
 - b. Volume of all wastes stored at the facility unit authorized in Provision II.B.;
 - Summary of the annual cost estimate adjustments for facility closure; and
 - d. The percentage of the incinerator's total permitted capacity utilized during the report year.
- 7. The permittee shall ensure that all waste analyses utilized for waste identification or verification have been performed in accordance with methods specified in the current editions of "Test Methods for Chemical Analysis of Water and Wastes" or "Test Methods for the Evaluation of Solid Waste" (SW-846) or other methods which are officially approved by the EPA. The permittee shall utilize only laboratories which follow a quality control/quality assurance program conforming to the program specified in "Test Methods for the Evaluation of Solid Waste" (SW-846).
- 8. The permittee shall comply with inspection requirements of 40 CFR 264.15.
- 9. The permittee shall comply with the training requirements of 40 CFR 264.16.
- 10. All tanks, sumps, pumps, fire and spill control equipment, decontamination equipment, and all other equipment and structures authorized or required by this permit shall be maintained in good functional condition.
- 11. The permittee shall secure and maintain liability coverage in compliance with the liability requirements of, and in a form outlined in, 40 CFR Part 264, Subpart H.
- 12. The permittee shall comply with the security requirements of 40 CFR 264.14.
- C. Tank Design, Construction, and Operation Requirements:

The permittee shall comply with the following minimum requirements for the tank authorized by <u>Provision II.B.</u>

CONTINUATION SHEET 6 OF 25

PERMIT NO. HW-50216

EPA I.D. NO. TXD 083570051

NAME: FMC - Peroxygen Chemicals Division

[III.C.]

1. The tank shall be constructed and operated in such a way as to not depart from the standards presented in Title 40, Code of Federal Regulations Sections 264.192-264.199.

D. General Air Quality Conditions

- 1. This facility shall be constructed and operated in accordance with and subject to the Texas Clean Air Act (TCAA) as amended (Article 4477-5, V.A.T.S.) and all applicable Rules, Regulations and Orders of the Texas Air Control Board (TACB). Said construction and operation is subject to any additional or amended Rules, Regulations, and Orders of the TACB adopted pursuant to the TCAA.
- 2. All representations with regard to construction plans and operating procedures in the permit application are conditions upon which this permit is issued. The permittee shall not vary from such representations if the change will cause a change in the method of control of emissions, the character of the emissions, or will result in an increase in the discharge of any air contaminant, unless he first makes an application to the Texas Water Commission (TWC) to amend the permit and such amendment is approved pursuant to the requirements of TACB Regulation X (31 TAC Chapter 120) and 31 TAC Chapter 335, Subchapter L. The TACB Central Office in Austin shall be notified at the time of such application to the TWC.
- 3. Start of construction of facility units, modification of an existing facility unit, interruption of construction exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the TACB not later than ten working days after occurrence of the event.
- 4. The appropriate regional office of the TACB shall be notified prior to the initial start-up of new or modified facility units authorized by this permit and prior to any required monitoring or sampling in such a manner that a representative of the TACB may be present at the time of the initial start-up, monitoring, or sampling.
- 5. Upon request by the Executive Director of the TACB, the permittee shall conduct sufficient sampling or other tests to prove satisfactory equipment performance. All calibration, sampling and testing procedures shall be approved by the Executive Director of the TACB and coordinated with the appropriate regional office representatives of the TACB.

CONTINUATION SHEET 7 OF 25

PERMIT NO. HW-50216 EPA I.D. NO. TXD 083570051

NAME: FMC - Peroxygen Chemicals Division

[III.D.]

6. If sampling is required, the permittee shall contact the Quality Assurance Division of the TACB prior to sampling to obtain the proper data forms and procedures. The permittee is responsible for providing sampling equipment and conducting sampling operations at his expense.

- 7. Information and data concerning the date, type and quantity of wastes managed, waste analyses, facility inspections, operating hours, sampling, and monitoring data shall be maintained in the operating record at the plant site and made available at the request of personnel from the TACB, TWC, or any local environmental pollution control program having jurisdiction. Unless otherwise specified in this permit, the operating record shall be retained for at least three years following the date that the information or data are obtained.
- 8. The facility units covered by this permit shall not be operated unless all associated air pollution abatement equipment is maintained in good working order and is operating properly during normal facility operations.
- 9. Emissions from the facility units shall not cause or contribute to a condition of "air pollution" as defined in Section 1.03 of the TCAA or violate Section 4.01 of the TCAA. If the Executive Director of the TACB determines that such a condition or violation occurs, the permittee shall implement additional abatement measures as necessary to control or prevent the condition or violation.
- 10. Acceptance of the permit constitutes an acknowledgement and agreement that the permittee will comply with all applicable Rules, Regulations and Orders of the TACB issued in conformity with the TCAA and the conditions precedent to the granting of this permit or any amendment to the permit. Failure to comply with all conditions of this permit or amendment will subject the permittee to the enforcement provisions of the TCAA, Article 4477-5, and the Solid Waste Disposal Act, Article 4477-7, V.A.T.S.
- 11. This permit covers only the sources of emissions listed in the attached table entitled, "Emission Sources Maximum Allowable Emission Rates", submitted by the TACB which is hereby made a part of this permit as "Attachment C" and those sources are limited to the emissions and other conditions specified in that attachment.
- 12. A copy of this permit shall be kept at the plant site and made available at the request of personnel from the TACB, TWC, or any local environmental pollution control program having jurisdiction.

CONTINUATION SHEET 8 OF 25

PERMIT NO. HW-50216

EPA I.D. NO. TXD 083570051

NAME: FMC - Peroxygen Chemicals Division

[III.D.]

13. The permittee shall construct and maintain the facility units in accordance with the plans and specifications represented in the application for this permit.

- 14. The permittee shall operate the facility units in compliance with all requirements of the Resource Conservation and Recovery Act and the rules promulgated thereunder as these directly or indirectly relate to air contaminant emissions.
- 15. The permittee shall operate the facility units in compliance with all rules and regulations of the TACB (except Regulation VI) and with the intent of the Texas Clean Air Act.
- 16. The permittee shall operate the facility units in compliance with the requirements of any applicable new source performance standard promulgated by the Environmental Protection Agency (EPA) pursuant to authority granted under the Federal Clean Air Act, Paragraph 111, as amended.
- 17. The permittee shall operate the facility units in compliance with all requirements of any applicable emissions standard for hazardous air pollutants promulgated by the EPA pursuant to authority granted under the Federal Clean Air Act, Paragraph 112, as amended.
- 18. Records shall be maintained on-site indicating the date, quantity, type, and composition of solid waste generated or managed at this facility. At a minimum, the definition of waste composition shall be provided in sufficient detail to identify the significant potential air contaminants. An analysis for those chemical compounds present in concentrations greater than one percent by volume of the total waste stream, which includes the concentration of the total organic carbon, shall be sufficient.
- E. Incinerator Performance Standards.

The permittee shall maintain and operate the incinerator unit so that it will meet the following performance standards.

- 1. The unit shall not emit hydrogen chloride (HCl) in excess of 4 pounds per hour (lb/hr).
- 2. The unit shall not emit particulate matter in excess of 0.08 grains per dry standard cubic foot when corrected for the amount of oxygen in the stack gas in accordance with the formula specified in 40 CFR Part 264.343(c).

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3. Compliance with the operating conditions specified in <u>Provisions III.F.l.-6.</u> of this permit will be regarded as compliance with the above performance standards. However, any evidence that compliance with the operating conditions or other permit conditions is insufficient to ensure compliance with the above performance standards may be "information" justifying modification, revocation, or reissuance of the permit pursuant to 40 CFR Part 270.41.

F. Incinerator Area Operating Conditions

The permittee shall feed hazardous wastes to the incinerator unit only under the following conditions:

- Incinerator operating instructions shall be readily available to incinerator operators.
- 2. The temperature of the combustion gas measured at the stack shall be maintained at not less than 1400°F.
- 3. The maximum volumetric flow rate through the system shall not exceed 80,000 actual cubic feet per minute (acfm) at 1400°F and 14.7 psia as measured at the stack.
- 4. The combustion gas concentration of carbon monoxide (CO) measured at the stack shall not exceed 100 ppm(v) dry basis, on a sixty-minute average.
- 5. Fugitive emissions from the combustion zone shall be controlled by keeping the combustion zone totally sealed against fugitive emissions. Compliance with this provision may be determined when no visible emissions escape to the atmosphere from any opening on the exterior of the combustion zone areas.
- 6. The permittee shall maintain and operate an automatic waste feed cut off system which shall activate under the conditions specified in Attachment D.

G. Limitations on Wastes Incinerated

- 1. Only spent methanol waste may be burned in the incinerator.
- 2. The total organically-bound chloride content of the total waste feed shall not exceed 4.0 lb/hr.
- 3. The hazardous waste feeds to the incinerator shall not contain greater than 100 ppm of organic hazardous constituents listed in 40 CFR Part 261, Appendix VIII, except naphthalene which may be present in concentrations up to 200 ppm.

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- 4. The total average heat value of the waste material and natural gas fired in the incinerator shall not be less than 7,236 BTU/lb of waste material fed to the unit.
- 5. The feed rate of total wastes to the incinerator shall not exceed 2,764 lb/hr.
- 6. The total ash content of the waste shall not exceed 0.1 percent by weight.
- 7. The combined heat of combustion and heat content of all streams fed to the incinerator system shall not exceed 20 million BTU/hr at any time.
- 8. Auxiliary fuel shall be either sweet natural gas containing not more than 1.5 grains of hydrogen sulfide per 100 cubic feet and not more than 30 grains of total sulfur per 100 cubic feet, liquified petroleum gas, diesel oil, or No. 2 fuel oil. All diesel oil or No. 2 fuel oil shall be first run refinery grade and shall not consist of a blend containing waste oils or solvents. Use of any other auxiliary fuel will require prior approval of the Executive Director of the Texas Air Control Board. The permittee shall determine the lower heating value and total sulfur content of any auxiliary fuel used in the incinerator.
- H. Other Incinerator Area Monitoring, Testing and Inspection Requirements
 - 1. Combustion temperature, total waste feed rate, auxiliary fuel flow rate, and CO concentration shall be monitored and recorded on a continuous basis.
 - 2. Carbon monoxide concentrations shall be measured with a continuous emission monitor (CEM). The CEM shall be certified by meeting the design and performance specifications, pass the field tests and meet the installation requirements, data analysis, and reporting requirements specified in the applicable Performance Specifications 40 CFR Part 60, Appendix B. In certifying the instrument, the permittee shall use appropriate reference methods and relative accuracy testing procedures specified in 40 CFR Part 60, Appendices A and B. If the CO monitor uses non-dispersive infrared (NDIR) analysis, a relative accuracy determination procedure shall be run using Reference Method 10A as found in 40 CFR Part 60, Appendix A. The carbon monoxide concentration shall be quantified as parts per million (ppm) by volume, dry basis.
 - 3. An appropriate indicator of combustion gas volumetric flow shall be utilized to quantify the volumetric flow as actual cubic per minute (acfm).

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4. The CEM systems shall be zeroed and spanned daily for each monitoring range. Corrective action shall be taken when the 24-hour span drift exceeds two times the amounts specified in 40 CFR Part 60, Appendix B or as specified by the TACB if not specified in Appendix B. Each calendar quarter, monitor accuracy shall be certified using a cylinder gas audit (CGA) as described in 40 CFR Part 60, Appendix F, Procedure 1, Section 5.1.2. Reference method testing can be substituted for cylinder gas audits if preferred by the permittee. Corrective action shall be taken when the CGA exceeds + 15 percent accuracy.

- 5. The incinerator and associated equipment must be visually inspected at least daily for leaks, spills, fugitive emissions, and signs of tampering.
- 6. The emergency cut off system and associated alarms that would initiate the cut off must be tested at least weekly to verify operability.
- 7. The permittee shall maintain an operating record of the monitoring and inspection data collected in <u>Provision III.H.1.</u> and as required by 40 CFR Part 264.73 and 264.347. In addition, the permittee shall also record the following events:
 - a. All occasions when the operating limits specified in <u>Provision III.F.1.-5.</u> are exceeded; and
 - b. All occasions when waste feed is cut off by the automatic waste feed cut off system, including the date and time of the incident, and, if applicable, the values of operating or waste feed parameters that triggered the cut off.
- 8. Opacity of emissions from any stack shall not exceed five (5) percent, except for uncombined water, other than for those periods described in Rule 111.21 of Regulation I of the TACB.

I. Incinerator Sampling Requirements

- 1. The permittee may conduct additional sampling and analysis of the waste and exhaust emissions and request a modification of the operating requirements of <u>Provisions III.F.l.-6.</u> of this permit based upon a showing that the modified requirements are adequate to meet the performance standards of 40 CFR Part 264.343 and Provisions III.E.l.-3. of this permit.
- 2. Throughout normal operation the permittee shall conduct sufficient waste analysis, at least annually, to verify that the waste feed to the incinerator is within the physical and chemical composition limits specified in the waste analysis plan.

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J. Additional Control Requirements

- 1. Facilities subject to these requirements include RCRA permitted storage tanks, loading facilities and associated sources of fugitive emissions handling hazardous wastes.
- 2. Filling of storage vessels shall be accomplished by submerged fill pipes or equivalent technology that will minimize emissions.
- 3. Any storage tank shall be equipped with a high level alarm.
- 4. Incinerator area tanks shall be operated such that the tank vapors are not displaced or otherwise vented directly to the atmosphere. Tank vapors may be displaced to the incinerator, or to the flare.
- 5. Incinerator area tanks shall be equipped with emergency pressure-relief devices.
- 6. Any leaking or defective tank shall be repaired or emptied into a container or tank in good condition. The repair or emptying shall occur as soon as possible but not later than the end of the next daylight shift.
- 7. When loading a tank truck, trailer, rail car or marine vessel with hazardous liquids or vapors, any displaced hazardous vapors shall be disposed of in the incinerator or equivalent device.
- 8. Transport vessels being loaded with hazardous waste shall have been leak tested within one year as evidenced by prominently displayed certification. Leak testing methods shall comply with the requirements of the biannual Department of Transportation hydrostatic test method found in 49 CFR Part 177.824, "Retesting and Inspection of Cargo Tanks."

K. Fugitive Monitoring and Maintenance Requirements

The permittee shall comply with these requirements for all equipment items which contact hazardous wastes:

- 1. Construction of new or replacement piping, valve, and pump systems shall conform to applicable ANSI, API, ASME, or equivalent codes.
- 2. All new or replacement valves and unwelded piping connections in hazardous waste service shall be above ground and so located as to be reasonably accessible for leak-checking during plant operation.
- 3. All new or replacement piping connections larger than two-inch nominal pipe size shall be welded or flanged.

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- 4. Prior to operation, all new or replacement pump, valve, and piping connections shall be hydrotested or gas tested at 100 percent or more of the maximum operating pressure and adjustments made as necessary to obtain bubble-tight, leak-free performance.
- 5. All new or replacement pumps shall be sealless or equipped with double mechanical seals using water or a non-volatile and non-hazardous barrier fluid which operates at a pressure greater than the process pressure.
- 6. All pumps, valves, flanges, and emergency pressure-relief devices shall be inspected on a daily basis for visual, audible, or olfactory evidence that the item is leaking.
- 7. All pumps, valves, flanges, and emergency pressure-relief devices shall be monitored quarterly with a hydrocarbon gas analyzer.

 Monitored values greater than 10,000 ppm as measured by EPA Method 21 shall be considered evidence of a leak.
- 8. Visibily leaking equipment shall be taken out of service or repaired or replaced by the end of the next daylight shift. Monitored leaking equipment shall be tagged and replaced or repaired within 15 days after the leak is found.
- 9. Records of monitoring and maintenance actions shall be maintained for a period of three years and shall be made available to authorized state and local air pollution control agency personnel upon request and shall, as a minimum, include the following data:
 - a. List of all components monitored.
 - b. Checklist indicating that regular inspections are being performed.
 - c. Summaries of monitoring and inspection information including the date, time, equipment identification, monitoring or inspection results and corrective actions taken for all leaking components and subsequent monitoring results confirming the effectiveness of the corrective action. Summaries may be computerized but shall be signed by the person responsible.
 - d. Records of the calibration of the hydrocarbon gas analyzer.
- 10. In lieu of <u>Provisions III.K.7.-9.</u>, the permittee may use the standards, methods, procedures, record keeping, and reporting requirements of 40 CFR Part 61, Subpart V for leak monitoring of any chemical in addition to the chemicals specified in Subpart J.

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IV. Closure

A. General Closure Requirements:

- 1. The permittee shall provide financial assurance for closure in accordance with the form outlined in 40 CFR 264, Subpart H in an initial amount not less than \$121,560. This financial assurance amount will be adjusted annually as specified in Provision IV.A.2.a. Financial assurance shall be secured and maintained in compliance with Commission regulations on hazardous waste financial requirements (31 TAC Section 335.152 and 40 CFR Part 264, Subpart H).
- 2. The permittee shall submit to the Executive Director upon request such information as may be necessary to determine the adequacy of financial assurance.
 - a. Within 60 days prior to the anniversary date of the financial assurance documents, or within 30 days after the firm's fiscal year for firms using the financial test or corporate guarantee, the facility's closure cost estimate shall be updated for inflation and submitted to the Executive Director. The adjustment shall be made by recalculating costs in current dollars, or by using an inflation factor derived from the most recent Implicit Price Deflator. Pursuant to 31 TAC 335.178, the cost estimate for closure shall be based on off-site disposal during closure of all waste and waste residue for all units not required to close as landfills.
 - b. If changes in the closure plan will increase the cost of closure, then the cost estimate shall be revised within 30 days after approval of the plan by the Executive Director. The revised cost shall also be adjusted as specified in Provision IV.A.2.a.

3. Facility closure shall commence

- a. Upon direction of the Texas Water Commission or the Executive Director for violation of the permit, TWC Rules, or State Statutes;
- Upon suspension, cancellation, or revocation of the terms and conditions of this permit concerning the authorization to store, process, or dispose of waste materials;
- c. Upon abandonment of the site;